

IN THE UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF PENNSYLVANIA

IN RE: TOBY J. WALKER, SR.,

BANKRUPTCY CASE NO. 16-70385  
CHAPTER 13

Debtor

Related to Claim No.: 9

PNC BANK, NA,

Movant

vs.

TOBY J. WALKER, SR. and  
RONDA J. WINNECOUR, ESQ, Trustee,  
Respondents

DECLARATION THAT THE EXISTING CHAPTER 13 PLAN IS SUFFICIENT TO FUND  
THE PLAN WITH THE MODIFIED DEBT OF PNC BANK, N.A.

1. Debtor filed for relief under Chapter 13 on May 19, 2016 at the above case number.
2. A Chapter 13 Plan has been confirmed.
3. A notice of mortgage change was filed on December 6, 2018 decreasing the mortgage payment from \$429.07 to \$427.89.
4. The existing Chapter 13 plan is sufficient to fund the plan with modified debt.

Respectfully Submitted:

By: /s/ Joseph E. Fieschko, Jr.  
Joseph E. Fieschko, Jr., Esquire  
Fieschko and Associates Inc.  
2230 Koppers Bldg.  
Pittsburgh, PA 15219  
412-281-2204  
PA I.D.#28797

AFFIDAVIT OF SERVICE

I, Joseph E. Fieschko, Jr., attorney for the debtor, do hereby swear, under penalty of perjury, that I have served a true and correct copy of the DECLARATION THAT THE EXISTING CHAPTER 13 PLAN IS SUFFICIENT TO FUND THE PLAN WITH THE MODIFIED DEBT OF PNC BANK, N.A., by First Class Mail and Electronic Filing, on the following:

First Class Mail:  
James C. Warmbrodt, Esquire  
KMI Law Group  
700 Market Street, Suite 5000  
Philadelphia, PA 19106

Electronic Filing:  
Ronda J. Winnecour, Chapter 13 trustee  
Office of the US Trustee

Dated: December 13, 2018

By: /s/Joseph E. Fieschko, Jr.  
Joseph E. Fieschko, Jr.